

UNITED STATES BANKRUPTCY COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Colleen Purtz & Stacey R. Purtz

Debtors

:

PNC Bank, National Association

Movant

:

:

: Chapter 13

: Case No: 16-14155

:

:

**Debtor's Response to the Motion for Relief from the Automatic Stay Under §
362 (d)**

NOW COMES, Colleen Purtz and Stacey Purtz (Debtors') by and through their attorney, Jason M. Rapa, Esquire hereby responds to the Motion for Relief from the Automatic Stay filed by PNC Bank, National Association.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part. Denied in part. It is admitted that Movant has not accepted Debtors payments from February through May. It is denied that

Debtors failed to make all the required payments as debtors admit falling behind but Movant refused to accept payments after Debtors delinquency.

7. Admitted. Debtor to make full payment necessary to reinstate the loan post-petition. Requests a 30 day extension in which to do so.
8. Denied. Debtor is now current with Trustee payments with a payment posting as of May 14, 2018.
9. Denied.
10. Denied.

WHEREFORE, Debtor respectfully request this Honorable Court Deny the Motion for Relief from Stay.

Respectfully Submitted,

/s/ Jason M. Rapa, Esq.

JASON M. RAPA, ESQUIRE

Attorney for Debtor

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